

Department of Energy

Richland Operations Office P.O. Box 550 Richland, Washington 99352

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Mr. Steve M. Alexander
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State of Washington
Department of Ecology
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Mr. Douglas R. Sherwood Hanford Project Manager U.S. Environmental Protection Agency 712 Swift Boulevard, Suite 5 Richland, Washington 99352-0539

Dear Messrs. Alexander and Sherwood:

RESPONSE TO COMMENTS



This letter acknowledges receipt of the U.S. Environmental Protection Agency (EPA) letter to Ms. L. K. McClain from Mr. D. R. Sherwood "Stop Document Preparation for 100-KR-2 and 100-FR-2," dated October 20, 1995. The EPA letter clarifies certain points so that EPA and the U.S. Department of Energy, Richland Operations Office (RL), have common understandings and expectations, and to request similar direction from the State of Washington, Department of Ecology (Ecology), regarding the 100-DR-2 and 100-HR-2 Operable Units.

RL has acted upon the direction in the EPA letter and stopped work on preparing the 100-KR-2 and 100-FR-2 Focused Feasibility Studies (FFS) and Interim Response Measures (IRM) Proposed Plans (PP). RL concurs that the existing documentation (DOE/RL-98-61, "100 Area Source Operable Unit Focused Feasibility Study," Appendices K and L), coupled with the approved 100 Area proposed plan format in DOE/RL-98-101, "Proposed Plan for Interim Remedial Measures at the 100-HR-1 Operable Unit," is adequate to satisfy existing milestone requirements for the 100-KR-2 and 100-FR-2 Operable Units. Consequently, RL accepts EPA's letter of October 20, 1995, as confirmation that the milestones have been met and hereby notify EPA that RL plans no further submittals to address these milestones. Specifically, Milestone M-15-33B, Submit 100-KR-2 IRM PP to Regulators (December 31, 1995), and proposed in (Approach and Plan for Cleanup Actions in the 100-FR-2 Operable Unit of the Hanford Site, DOE/RL-95-38, Rev. 0) milestone, Submit 100-FR-2 IRM PP to Regulators (October 31, 1995) have been met.

RL further concurs that an agreement is expected to be reached in the near future to address the remaining waste sites in the 100 Areas on an area-wide basis rather than on an operable unit basis. RL anticipates incorporating the information from existing 100 Areas Operable Unit documents into area-wide

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documents pending adoption of a new record of decision (ROD) strategy. The new ROD Strategy is expected to address remaining liquid waste disposal sites separately from burial grounds in the 100 Areas.

RL further notes that EPA plans to provide no additional comments on the 100-BC-2, 100-FR-1, and 100-KR-1 FFS and IRM PPs until such time that a new ROD Strategy is adopted. Future comments, if any, will apply to the new area-wide documents and not the Operable Unit specific documents.

Ecology did not sign the October 20, 1995, letter, but it is RL's assumption that Ecology is in agreement with this direction. RL believes that this is a positive step to reduce costs and to reduce the time needed to reach actual cleanup in the field. Consequently, RL requests that Ecology provide similar direction regarding the 100-DR-2 and 100-HR-2 IRM PPs.

If you have any questions or comments, please contact Mr. Glenn Goldberg at 376-9552.

Sincerely,

Linda K. McClain, Assistant Manager for Environmental Restoration

GWP:GIG

cc: D. Faulk, EPA

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W. Soper, Ecology

P. Staats, Ecology

R. Stanley, Ecology

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